

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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In the Matter of the Application of Southern
California Gas Company (U 904 G), San Diego
Gas & Electric Company (U 902 M) and
Southern California Edison Company (U 338 E)
for Approval of Changes to Natural Gas
Operations and Service Offerings

A. 06-08-026
(Filed August 28, 2006)

MOTION TO INTERVENE OF CITY OF LONG BEACH GAS & OIL DEPARTMENT

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April 9, 2007

Attorneys for the City of Long Beach
Gas & Oil Department

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of Southern California Gas Company (U 904 G), San Diego Gas & Electric Company (U 902 M) and Southern California Edison Company (U 338 E) for Approval of Changes to Natural Gas Operations and Service Offerings

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MOTION TO INTERVENE OF CITY OF LONG BEACH GAS & OIL DEPARTMENT

Pursuant to Rules 1.4(a) and 11 of the Commission's Rules of Practice and Procedure, the City of Long Beach Gas & Oil Department ("Long Beach") hereby moves for leave to intervene and participate as an active party in the above captioned proceeding.

Long Beach is the largest municipal gas utility in California and the fifth largest in the nation. It has provided gas service to residents of Long Beach since 1924 and currently provides such service to over half a million persons. Long Beach has long relied upon Southern California Gas Company ("SoCalGas") for wholesale transportation and storage services in order for Long Beach to meet the needs of its own retail customers and currently relies on SoCalGas for these essential services. In A.06-08-026, SoCalGas and San Diego Gas & Electric Company ("SDG&E") have requested Commission authorization to implement numerous changes in the operations and services provided by SoCalGas. These changes include a number of changes in SoCalGas' gas storage operations and services which could have potentially significant adverse impacts on Long Beach and its retail customers, including changes in the way storage capacities necessary to meet core reliability requirements are reserved; changes in relative parity between the rights and obligations of SDG&E's and Long Beach's core customers with respect to gas storage; and changes in maximum G-TBS price caps. As a result, Long Beach has a very significant interest in this proceeding.

Long Beach's contentions in this proceeding will be reasonably pertinent to the issues raised by the proposals SoCalGas and SDG&E have made in A.06-08-026 and other parties' protests to the application. Long Beach intends to address the changes proposed by SoCalGas and SDG&E in gas storage operations and services and to advocate that the Commission acknowledge and maintain core parity with respect to wholesale customers on the SoCalGas system that have their own retail core customers, including in particular SDG&E and Long Beach.

Long Beach previously served written prepared testimony addressing its concerns on March 22, 2007, the date set for service of prepared testimony by intervenors in this proceeding.¹ It did so to ensure that its participation would not disadvantage any party or require any delay in the schedule for this proceeding.

Long Beach requests that all pleadings, correspondence, orders, decisions and other communications in this matter be served on:

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¹ *Prepared Direct Testimony of John Burkholder on Behalf of The City of Long Beach Gas and Oil Department* (March 22, 2007).

Long Beach further requests that the following additional appearance be included on the service list for this proceeding as “Information Only:”

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Long Beach further requests that John Burkholder, Beta Consulting, 2023 Tudor Lane, Fallbrook, CA 92028, Telephone 760-723-1831, Facsimile 760-723-1891, E-mail Burkee@cts.com be retained on the service list as an additional appearance for the Long Beach.

For the reasons set forth above, Long Beach respectfully requests that the Commission grant its motion for leave to intervene and participate as a party in this proceeding.

Respectfully submitted,

By: /s/ Edward W. O’Neill
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Dated: April 9, 2007

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Gas & Oil Department

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of Southern California Gas Company (U 904 G), San Diego Gas & Electric Company (U 902 M) and Southern California Edison Company (U 338 E) for Approval of Changes to Natural Gas Operations and Service Offerings

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(Filed August 28, 2006)

**[PROPOSED] ADMINISTRATIVE LAW JUDGE RULING ON
MOTION TO INTERVENE OF CITY OF LONG BEACH GAS & OIL DEPARTMENT**

On April 9, 2007, City of Long Beach Gas & Oil Department (“Long Beach”) moved to intervene in A.06-08-026.

Long Beach is a municipal gas utility that currently relies upon Southern California Gas Company (“SoCalGas”) for wholesale transportation and storage services in order to meet the needs of its own retail customers. SoCalGas has proposed changes in its operations and services that could potentially have an adverse impact on Long Beach and the retail customers it serves. Long Beach has demonstrated that it has a significant interest in this proceeding and that its contentions will be reasonably pertinent to A.06-08-026 as required by Rule 1.4(a) of the Commission’s Rules of Practice and Procedure.

Therefore, **IT IS RULED** that, good cause appearing,

1. The request of City of Long Beach Gas & Oil Department to intervene is granted.
2. Long Beach shall serve all parties of record and any other entities designated for service with any testimony and/or pleadings filed by Long Beach in this proceeding.

Dated April ___, 2007 at San Francisco, California.

Administrative Law Judge

CERTIFICATE OF SERVICE

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111-6533.

On April 9, 2007, I caused the following to be served:

MOTION TO INTERVENE OF CITY OF LONG BEACH GAS & OIL DEPARTMENT

via electronic mail to all parties on the service list A. 06-08-026 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as “Appearance” and “State Service” on the attached service list who have not provided an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.

/s/ Judy Pau

Judy Pau

VIA EMAIL AND US MAIL

Commissioner Michael Peevey
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Administrative Law Judge Thomas Pulsifer
California Public Utilities Commission
505 Van Ness Ave,
San Francisco, CA 94102

CALIFORNIA PUBLIC UTILITIES COMMISSION
SERVICE LISTS

Proceeding: A0608026 - SOCALGAS, SDG&E, EDI
Filer: SAN DIEGO GAS & ELECTRIC COMPANY (U902E)
List Name: LIST
Last changed: March 28, 2007

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